

STATE OF INDIANA      )                          IN THE MARION SUPERIOR COURT  
                              ) SS:  
COUNTY OF MARION      )                          CAUSE NO.

JANICE WALTERS

VS.

JOHN DOE and SAM'S EAST, INC.,  
d/b/a Sam's Club

**COMPLAINT FOR DAMAGES**

Comes now the plaintiff, Janice Walters, by counsel, Ken Nunn Law Office, and for cause of action against the defendants, John Doe and Sam's East, Inc., d/b/a Sam's Club, alleges and says:

1. That on or about March 3, 2020, as the plaintiff was attempting to retrieve a cart from the cart corral at the Sam's Club store located at 7235 East 96th Street in Indianapolis, Marion County, Indiana, an unknown defendant, John Doe, negligently pushed a row of shopping carts into plaintiff, causing plaintiff to fall and suffer serious injuries.

2. That the unknown defendant, John Doe, was in the course and scope of his employment for the defendant, Sam's East, Inc., d/b/a Sam's Club.

3. That the defendant, Sam's East, Inc., d/b/a Sam's Club, is liable for damages to plaintiff for all negligent acts committed by its unknown employee, John Doe, in the course of his employment.

4. That the plaintiff received permanent injuries as a result of the defendants' negligence.

5. That the plaintiff has incurred medical expenses and other special expenses in an amount to be proven at the trial of this cause, and will incur future medical expenses, lost wages, and other special expenses, as a direct and proximate result of defendants' negligence.

WHEREFORE, the plaintiff demands judgment against the defendants for permanent injuries in a reasonable amount to be determined at the trial of this cause, for medical expenses and other special expenses, for future medical expenses, lost wages, and other special expenses, court costs, and all other proper relief in the premises.

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**REQUEST FOR TRIAL BY JURY**

Comes now the plaintiff, by counsel, Ken Nunn Law Office, and requests that this matter be tried by jury pursuant to Trial Rule 38.

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